

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JAMES W. RILEY,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 06-001-GMS
STANLEY TAYLOR, THOMAS)	
CARROLL, DAVID PIERCE, AMY)	Jury Trial Demanded
MUNSON, MEDICAL ASSISTANT)	
MALANEY, CORRECTIONAL)	
MEDICAL SYSTEMS, FIRST)	
CORRECTIONAL MEDICAL,)	
)	
Defendants.)	

**REQUEST FOR PRODUCTION OF DOCUMENTS – 1 OF DEFENDANTS,
CORRECTIONAL MEDICAL SERVICES, INC., AND CHRISTINE MALANEY
DIRECTED TO PLAINTIFF**

Defendants, Correctional Medical Services, Inc. and Christine Malaney , by their attorneys, Marshall, Dennehey, Warner, Coleman and Goggin, hereby request that plaintiff produce and permit defendants to inspect and copy the following documents within thirty (30) days of the service of this request:

1. All statements of any and all witnesses, including any statements from the plaintiff or defendants herein regarding the happening of the incidents· here involved and/or the circumstances leading up to or subsequent to the incidents here involved.
2. All statements which may have been taken in connection with this litigation, including written statements, transcriptions of recorded interviews and summaries of oral statements.
3. All reports, records, or any other documentation whatsoever regarding plaintiff's medical conditions, injuries, medical care and treatment which are related to this litigation.

4. All notes, diaries, or any other recordings or documentations made by the plaintiff regarding the incidents here involved as well as those events and circumstances leading up to and subsequent to the incidents which are the subject of this litigation as well as the injuries, complaints, conditions, and losses alleged to have been sustained.

5. All reports generated by any police department or other official governmental agency concerning plaintiff's medical care and treatment which are related to this litigation.

6. All expert reports relating to liability and damages prepared by experts expected to testify at trial on behalf of plaintiff.

7. All documents requested to be identified in the Interrogatories set forth above.

8. All documents reviewed, relied upon or used in responding to the Interrogatories set forth above.

9. All sick call slips you filed referring or relating to the allegations in your Complaints/Amended Complaints and the injuries you claim you suffered.

10. All grievances, medical grievances and grievance appeals you filed referring or relating to the allegations in your Complaints/Amended Complaints and the injuries you claim you suffered from being denied proper medical care and/or treatment.

11. Any and all letters, notes and/or other documents you sent or authored regarding the illnesses and/or injuries you claim you suffered from being denied proper medical care and/or treatment.

12. Any and all documents which comprise any diary, journal, log, or other written account of the injuries you claim you suffered as a result of the allegations in your Complaints/Amended Complaints or which describe, detail, or document any other aspect of your life since you have been incarcerated, or which relate to any aspect of your injuries which pre-exist your incarceration.

13. Any and all documents, medical reports, notes, reports of diagnostic tests, charts, diagrams, images, emergency room or ambulance reports, or any other medical records, which describe in detail your diagnosis of and treatment for any psychiatric illness.

14. Any and all documents, medical reports, notes, reports of diagnostic tests, charts, diagrams, images, emergency room or ambulance reports, or any other medical records which support or refute your claim that you were denied proper medical care or treatment.

15. All documents you intend to introduce into evidence at the trial of this action.

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

BY /s/ Kevin J. Connors

KEVIN J. CONNORS, ESQUIRE

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Attorney for Defendants, CORRECTIONAL
MEDICAL SERVICES, INC. AND CHRISTINE
MALANEY

DATED: October 30, 2007

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